

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**UNITED STATES OF AMERICA,** )

**Appellee,** )

**v.** )

**No. 24-3019**

**CHARLES EDWARD  
LITTLEJOHN,** )

**Appellant.** )

**UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE**

Appellant Charles Littlejohn respectfully moves for a 74-day extension of time, up to and including November 8, 2024, to file his opening brief. Pursuant to D.C. Cir. Rule 28(e)(3), government counsel has been contacted and does not oppose this request. In support of this motion, appellant states as follows:

1. Pursuant to the Court’s May 28, 2024 Order, Mr. Littlejohn’s opening brief is currently due on August 26, 2024. Oral argument has not yet been scheduled.

2. Undersigned counsel has begun review of Mr. Littlejohn’s case and in the course thereof received the record materials from trial counsel at the end of July. In reviewing those materials and speaking with trial counsel, undersigned counsel learned of at least two proceedings *in camera* “off the record,” which were not recorded or transcribed. Counsel is in the process of determining how to

proceed in light of the unrecorded proceedings, which likely will require that a statement of the proceedings be prepared and submitted to the district court for settlement and approval pursuant to Federal Rule of Appellate Procedure 10(c). This process will require considerable time and extensive correspondence with trial counsel and government counsel. In addition, counsel will be on prescheduled leave for 14 days in August and September. Therefore, counsel requests additional time to complete the opening brief in this case.

3. The government does not oppose this motion.

Accordingly, Mr. Littlejohn respectfully requests that the deadline for the filing of his opening brief be extended to November 8, 2024.

Respectfully submitted,

A.J. Kramer  
Federal Public Defender

/s/

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing motion contains 255 words in Times New Roman 14 pt. font and does not exceed the word limit of Fed. R. App. P. 27(d)(2).

/s/

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Celia Goetzl